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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Incentives for Distributed Generation And Distributed Energy Resources	:	**Rulemaking 04-03-017 (Filed March 16, 2004)**

UTC POWER CORPORATION REPLY TO FCE PETITION FOR MODIFICATION OF DECISION 04-12-045

August 23, 2007

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I. INTRODUCTION

In accordance with Rule 16.4(d) of the California Public Utility Commission ("CPUC") Rules of Practice and Procedure, UTC Power submits this reply to the Petition for Modification of Decision 04-12-045 filed by Fuel Cell Energy ("FCE") on July 25, 2007. In that request, FCE requested the CPUC to modify its prior decision and increase the limit on incentive payments available under the Self-Generation Incentive Program ("SGIP") from the current level of 1MW to 3MW.

UTC Power was not a prior participant in this matter because its interests were adequately represented by others in the prior stages of this proceeding.[1] However, UTC Power is actively participating in the sale of fuel cell power plants in the California market and is therefore directly affected by the CPUC's prior decision in this proceeding and would be affected by the modification proposed by FCE.

UTC Power encourages the CPUC to deny FCE's request to modify incentive payment levels for the reasons set forth below.

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[1] Rule of Practice and Procedure 16.4(e)

II. FCE PETITION SHOULD BE DENIED AS OUT OF TIME AND PRESENTED WITHOUT ADEQUATE JUSTIFICATION

UTC Power objects to FCE's request as out of time. FCE filed its petition beyond a year following the CPUC's issuance of the decision FCE seeks to modify.[2] FCE asserts the reason for the delay in its request for modification is that the basis for its request is experience gained over the six year history of the program, which precluded filing within a year. The claim is without merit. Potential customers of every size, including the larger customers FCE now seeks the SGIP to fund, have existed since the SGIP's inception. In the same way, larger technologies have existed since the SGIP's inception. There is no fact or circumstance that precluded FCE from raising its request to modify limits on incentive payments in a timely way. The CPUC should deny the FCE petition as out of time and presented without adequate justification for the late submission.

III. THE INCENTIVE LEVEL SHOULD BE MAINTAINED AT 1MW TO ENSURE BROAD DISTRIBUTION OF FUNDS AND TO PRESERVE THE SGIP'S SUCCESS TREND.

If the CPUC considers the merits of FCE's request, it should deny the request for modification for the same reasons the CPUC has decided previously to maintain the incentive payment level at 1MW, which is to ensure broad distribution of funds to customers. Moreover, although FCE states that it is time to change the SGIP program as its been in effect for six years[3], the data FCE sets forth demonstrates the SGIP is increasingly successful as structured, in general and specifically with respect to increased fuel cell deployment within the SGIP.

A. The SGIP has already been modified to enable larger project participation in a way that does not deplete funds and ensures broad distribution of resources to customers.

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[2] Rule of Practice and Procedure 16.4(d)

[3] FCE Petition at page 9.

The CPUC has already modified the SGIP to accommodate large projects. On two occasions, the CPUC increased project size cap to enable distributed generation units larger than 1MW to participate in the SGIP. In Decision 02-02-026, the CPUC increased the 1MW project size limit to 1.5MW. In Decision 04-12-045, the CPUC further increased the project size limit to 5MW to accommodate larger projects. In both cases, the CPUC properly concluded not to increase incentive payment beyond 1MW in order not to allow large projects to deplete the SGIP annual budget and to assure a broad dispersion of funds. The reasons the CPUC decided not to increase incentive payments beyond 1MW in those decisions remain valid today: increasing the incentive payment beyond 1MW would minimize the overall number of projects funded by SGIP prior to the annual budgets being depleted and adversely affect the broad dispersion of funds to ratepayers.

B. **The SGIP is successful at current incentive levels; the data suggests no need to modify incentive levels at this time for continued market penetration.**

Next, in asking the CPUC to modify the SGIP, FCE observes that the "...the participation of fuel cell projects has grown steadily..." since program's start in 2001.[4]. It further points out that program year 2006 saw the highest level of participation to date.[5] FCE provides a graph illustrating a marked increase in the level of fuel cell project deployment within SGIP.[6] FCE's point, that SGIP is currently working well, and that fuel cell projects within SGIP are on the upswing under the SGIP as currently structured, is precisely the reason the CPUC should maintain the program's current structure and incentive payment limit at 1MW. The data as set forth by FCE shows clearly that now is not the time to interrupt the SGIP's accelerating success in broad terms and in fuel cell deployment more specifically. Only if the graph set forth by FCE showed a real decline in fuel cell project

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[4] FCE Petition at page 5

[5] Id.

[6] Id.

deployment within SGIP as structured would FCE's recommendation for program modification make good sense at this time.

C. Maintaining current incentive levels so that the SGIP supports more projects is the way to increase volume, lower costs, and increase market penetration.

FCE argues that increasing the incentive payment level to 3MW would facilitate market transformation for fuel cell technology and enable economies of scale to be recognized when a higher volume of fuel cells are manufactured and sold, resulting in lower costs that would enable a greater proliferation of fuel cell technology.[7] FCE is right that higher sales volume enable lower costs, which in turn facilitates greater market penetration. That dynamic, however, is not tied to larger projects: it is the overall number of fuel cells manufactured and sold that promotes economies of scale that lead to price reductions. Moreover, a higher number of smaller projects promotes competition and innovation in new clean energy technologies to the ultimate benefit of consumers far greater than would a smaller number of larger projects. To the extent a benefit of the SGIP is an increase in manufacturing volumes to lower costs, that end is most effectively executed by the current incentive level which encourages the broad distribution of funds to customers.

D. The proposal's "only" downside identified by FCE is material and is not offset by projects that are only viable if large.

FCE argues that the "only" potential downside of increasing the incentive level to 3MW is that fewer projects would be implemented and fewer host customers could participate in the SGIP.[8] To the extent there is only one potential downside, that downside – fewer funded projects – is material. To modify the program in a way that puts the goal of broad distribution of funds at significant risk is not only one downside; it is a material shortcoming to the request. FCE further suggests that

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[7] FCE Petition at page 8.

[8] FCE Petition at page 9.

while the larger projects for which it seeks SGIP funds may alter the overall number of projects participating in the SGIP, the concern is outweighed by the benefits of the proposed modification.[9] The discreet benefits associated with changing the program to fund particular applications "that can only be economically marketed if sized over 1MW"[10] does not offset the harm caused by diminishing funds available for broad distribution to customers.

E. The proposed after-the-fact assessment of harm caused to the program and customers by the incentive level increase does not adequately protect program participation rates or customers.

FCE recommends that if the CPUC is concerned about the consequence the FCE proposal would have on the broad distribution of funds to customers, the CPUC should raise the incentive payment cap, authorize additional SGIP funding now to support the modification and consider implementing mitigation measures after observing the impact the change in the incentive payment has on project participation in a year or two.[11] First, if there are additional funds available for the SGIP, the SGIP data discussed above on the program's success in broad terms and with respect to fuel cell deployment suggests it should be directed to the program as currently structured. Next, FCE's proposed after-the- fact assessment of harm caused to the program and customers is inadequate. The mitigation measures FCE suggests would take place only after funds are depleted by larger projects and after currently eligible customers are adversely affected.

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[9] FCE Petition at page 9.

[10] FCE Petition at page 9.

[11] FCE Petition at page 9.

IV. CONCLUSION

For the reasons discussed herein, UTC Power requests the CPUC deny the petition of FCE and to maintain the SGIP's incentive payment level at 1MW.

August 23, 2007

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of "UTC Power Corporation Objection To FCE Petition for Modification of Decision 04-12-045" on all known parties to R04-03-017 by transmitting an email message with the document attached to each party named on the official service list. Parties who did not provide an email address were mailed a properly addressed copy via first class mail with postage prepaid.

Executed on August 23, 2007 in South Windsor, Connecticut

John A. Schuster
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